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ACCEPTED
Legal 203/11-16-04

**TO: LEN S. ANTHONY
DEPUTY GENERAL COUNSEL-REGULATORY AFFAIRS
PROGRESS ENERGY SERVICE CO., LLC
P.O. BOX 1551
RALEIGH, N.C. 27602-1551
PH: 1 919 546 6367
FAX: 1 919 546 2694
EMAIL: _____
COUNSEL FOR PROGRESS ENERGY**

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EXECUTIVE DIRECTORS OFFICE

POSTED
2011-16-04

**FROM: NAME: GARY WEAVER
ADDRESS: PO BOX 7682 FLORENCE SC 29502
PHONE #:
TELEFAX #:
EMAIL :**

**SUBJECT: Progress Energy
File No: 04-E-2010;
PEC Account No. 752-151-1336
Meter No. B91771
2ND Petition.
FIRST SET OF INTERROGATORIES FOR GARY WEAVER**

DATE: November 10, 2004

No of Pages: SIX INCLUSIVE

Mr. Anthony:

Enclosed please find my Response to your First Set of Interrogatories. I apologize for the delay due to pre-occupation with Mrs. Weaver's ill health brought on by the unwarranted, illegal, on-going regulatory persecution by your Office, and my unavoidable out-of-state business travels.

Your Interrogatory is inappropriate to the issues you have presented to the Commission for adjudication and Mrs. Weaver's complaint to the Office of Regulatory Staff.

As to your arrogant violations and allegations, contrived, false and misleading as they are, the issue is simply whether or not you had access to the meters. You did ! On this you are mounting a major persecution of a customer.

Mrs. Weaver's complaint is that you violated Commission rules in arbitrarily and unjustifiably, unilaterally and incorrectly changing the status of one of her properties from a residence to a "storage shed" to cover up your errors and violations of Commission rules. You did !

The issue of whether not there is any debt outstanding and several directly related issues, is in dispute and has been since November 21, 2001. There is no

justification for involving Mrs. Weaver in this dispute for reasons that will come out in the pending Court litigation between us. Any such obligations as may eventually be decided by a Court in Florence or Dillon, is of course my responsibility not hers. I have stated this in writing several times and in affidavits that I am directly responsible and Mrs. Weaver has no legal liability whatsoever.

You knew and should have known of this, yet you have embarked on a series of severe transgressions and engaged in deliberate and malicious activities against her. Any and all matters pertaining to the alleged debt should be directly addressed to me and not her. You must hold me accountable, not her.

Notwithstanding, that alleged debt issue is totally unrelated to your false allegations that your meter readers were denied access to read the meters. That is your charge before the Commission pure and simple. All else is a deliberate attempt to obfuscate the issues and manipulate the Commission.

Your legal tactics are clear to me. You are manipulating the Commission and ORS and their staff with the Interrogatory and other pleadings to solicit information totally unrelated to the issues at hand before the Commission, and possibly illegal at that.

Accordingly, I object to the Interrogatory which is irrelevant and immaterial as to me, since the tenor and tone of the questions relate directly to the Court cases, not to the ridiculous, frivolous and nuisance Petitions you have filed. You are once again attempting to manipulate the situation for purposes other than resolution of the petitions that lack substance as to whether or not you had access to the meters.

That is my response to your Interrogatory. If you have further questions do not hesitate to contact me. I shall be contacting you in the near future.

I am sending this via telefax and mail to all related parties at the below-stated addresses, either via telefax and/or U.S. mail on this day, November 10, 2004.

Thank you.

Encl: 1

cc: ✓ Executive Director
Office of the Executive Director
P.O. Drawer 11649
S.C. Public Service Commission
Ph: 1 803 896 5713/5230;
Fax 1803 8965231

S.C. Office of Regulatory Staff
PO Box 11263
Colombia SC 29211
Attn: Mr. Chad Campbell
Ph: 1 803 737 0800; 1 800 922 1531;
Fax 1803 7370801

Daniel H. Shine, Esq
Attorney at Law
211 West Hampton St.
Dillon S.C. 29536

Mrs. Beatrice Weaver
1253 Harllees Bridge Road
Dillon SC 29536

**PROGRESS ENERGY CAROLINAS, INC.
INTERROGATORY #1 FOR GARY WEAVER
SCPSC DOCKET NO. 2004-219-E**

1. Where do you presently reside?

| | |
|----------------|--|
| Street Address | 701 W. Palmetto St, SC 29501 Florence SC |
| City | |
| State | 259 W. Calle de Caballos St, Tempe Arizona 85284-5255 |

2. What is your home telephone number and is the phone service in your name?

Response:

none

3. Do you own your present residence, rent it, or have some other arrangement?

Own ___ Rent/Lease ___ Other x Objection -irrelevant; immaterial
If "Other," please elaborate: violation of privacy

4. If you do not own the residence in which you live, who does?

Response:

Objection-irrelevant; immaterial; violation of privacy

5. What is the legal status of your marriage to Beatrice Weaver?

Response:

Objection-irrelevant; immaterial; violation of privacy

6. If you indicated in your response to Question #5 that divorce or legal separation proceedings have been initiated, please state the city and county where those proceedings were initiated, and the date they were initiated:

| | |
|----------------|--|
| City | |
| County | |
| Date Initiated | |

Objection- irrelevant; immaterial
violation of privacy

7. Do you still maintain an office on the 1253 Harllees Bridge Road property in Little Rock, SC? (NOTE: for purposes of this interrogatory, "1253 Harllees Bridge Road property" refers to the entire 9.43 acre tract originally purchased by Renaissance International, Inc., i.e. before any subdivision of the property took place). Yes ___ No x Refer to correspondence in your files

Objection-irrelevant; immaterial; violation of privacy

8. If the answer to Question #7 is "Yes," please indicate with an "X" in the blanks below in which of the three metered structures (i.e. those to which Progress Energy provides metered electric service) your office is located:

House _____

Metered structure closest to house _____

Barn at rear of property _____

Other (please explain): _____

NA

Objection -irrelevant; immaterial; violation of privacy

9. If the answer to Question #7 is "Yes," do you lease the property on which your office is located? Yes _____ No _____ If "Yes," from whom do you lease the office property?

Response: NA

Objection-irrelevant; immaterial; violation of privacy

10. If the answer to Question #7 is "Yes," approximately how many hours a week do you spend in said office? _____ hours/week

NA

Objection-irrelevant; immaterial; violation of privacy

11. You have stated in Item #14, Page 3 of your "Memorandum In Support of Motion to Dismiss With Prejudice And For Sanctions" filed with Dillon County Clerk of Court on September 3, 2004, that "Defendant Gary Weaver continues contact with Defendant Beatrice Weaver to assist her with personal and property maintenance matters." Approximately how many hours do you spend per week at the 1253 Harlees Bridge Road property in that capacity? _____ hours/week

Objection-irrelevant; immaterial; violation of privacy

12. Do you receive any monetary compensation for assisting Mrs. Weaver with personal and property maintenance matters? Yes _____ No X

Objection-irrelevant; immaterial; violation of privacy

13. What was your title with Renaissance International, Inc. (RII) when that corporation was located in Hawaii?

Response: Officer

Objection-irrelevant; immaterial; violation of privacy

14. Did you continue in that capacity with RII after the corporation relocated to South Carolina in June 1994? Yes X No _____

Objection-irrelevant; immaterial; violation of privacy

15. Have you, at any time since the relocation of RII to South Carolina, signed any legal documents identifying yourself as a vice president of RII?

Yes X No _____

Objection -irrelevant; immaterial; violation of privacy

16. At any time during calendar year 2004 have you received any monetary compensation and/or other considerations from RII? Yes ___ No x

Objection-irrelevant; immaterial; violation of privacy

17. Are you presently or have you ever been employed in any capacity, either as an officer, full-time employee, part-time employee, or contractor, by any of the following entities? Please check the applicable blank below:

NOT EMPLOYED FOR COMPENSATION

| | Yes | No |
|---|-----|----|
| Renaissance International Inc. | | |
| Renaissance Estate & Farms | | |
| Little Rock Stables | | |
| St. Elizabeth of the Roses Benevolent Society | | |
| "Be My Guest" Wellness Retreat | | |
| Octadome, Inc. | | |
| B.E.A. Wallenstein Living Trust | | |

OBJECTION: IRRELEVANT; IMMATERIAL; VIOLATION OF PRIVACY

18. Do you presently receive any monetary income from any of the entities listed in Question #16? Yes ___ No x

Objection-irrelevant; immaterial; violation of privacy

19. Please provide the date when you first took up residence at the house on the 1253 Harlees Bridge Road property:

Response: 1994

20. Mrs. Weaver, the President of RII, has stated in writing that she was "12,000 miles away" when RII purchased the 1253 Harlees Bridge Road property in June 1994. Did you represent RII in that transaction? Yes x No ___

Objection-irrelevant; immaterial; violation of privacy

21. What is the nature of your relationship with Ms. Dorothy Roscinsky (or Roscinski)?

Response:

Objection -irrelevant; immaterial; violation of privacy

22. What is the nature of your relationship with Rev. Cherian Thalakulam?

Response:

Objection-irrelevant; immaterial; violation of privacy

23. What is the nature of your relationship with Thomas S. Cribb?

Response: none

Objection -irrelevant; immaterial; violation of privacy

24. What is the nature of your relationship with Mary Long?

Response:

Objection -irrelevant; immaterial; violation of privacy

25. What is the nature of your relationship with Thomas McFadden?

Response: none

Objection-irrelevant; immaterial; violation of privacy

26. Have you installed, or caused to have installed, any permanent or temporary electrical lines from the metered structure closest to the house on the 1253 Harllees Bridge Road property to the house itself? Yes ___ No x

NO LINES FROM THE METER

NO VIOLATION EXISTS